

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Chapter 11**
§
FIELDWOOD ENERGY III LLC, et al., § **Case No. 20-33948 (MI)**
§
§ **(Jointly Administered)**
Post-Effective Date Debtors.¹ §

**CERTIFICATE OF COUNSEL TO FIRST OMNIBUS OBJECTION TO CLAIMS
PURSUANT TO SECTION 502(B) OF THE BANKRUPTCY CODE AND RULE 3007 OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE SEEKING TO
DISALLOW CERTAIN CLAIMS (DUPLICATE CLAIMS)
(Related Docket No. 2076)**

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's First Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims* [Docket No. 2076] (the "First Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan (the "Plan Administrator") of the above-captioned reorganized debtors. One of the claims identified in the First Omnibus Objection as a duplicate claim subject to objection was Claim No. 176 (the

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

“Zurich Claim”) filed by Zurich American Insurance (“Zurich”). The deadline for parties to object to the First Omnibus Objection was November 5, 2021 (the “Response Deadline”).

2. On November 4, 2021, the Court entered the *Stipulation and Agreed Order Extending Response Deadline to Claim Objection* [Docket No. 2157], which extended the Response Deadline with respect to, *inter alia*, the Zurich Claim to November 19, 2021.

3. On November 22, 2021, the Court entered the *Stipulation and Agreed Order Extending Response Deadline to Claim Objection and Adjourning Hearing Date* [Docket No. 2255] (the “Second Stipulation”), adjourning the hearing on, *inter alia*, the First Omnibus Objection with respect to the Zurich Claim, to a date to be determined and separately noticed on no less than 20 days’ notice. Zurich’s Response Deadline was likewise extended to five business days prior to any such hearing.

4. On December 7, 2021, the Court entered an Order at Docket No. 2301 sustaining the First Omnibus Objection, as amended, except with respect to the Zurich Claim.

5. On January 5, 2022, the Plan Administrator filed that certain Notice of Hearing (the “Notice of Hearing”) with respect to the First Omnibus Objection and the Zurich Claim. *See* Docket No. 2330. The Notice of Hearing provided that, after consultation with the Court’s Case Manager, the hearing on the First Omnibus Objection with respect to the Zurich Claim would be set for February 8, 2022 at 10:00 a.m. (Central Time). Accordingly, Zurich’s Response Deadline to the First Omnibus Objection was extended to February 1, 2022. On that same date, the Notice of Hearing was served on Zurich. *See* Docket No. 2335.

6. Zurich failed to file any response to the First Omnibus Objection on the docket prior to its February 1, 2022 Response Deadline or as of the date hereof.

7. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “**Revised Proposed Order**”), which sustains the First Omnibus Objection solely as to the Zurich Claim. A redline reflecting changes from the proposed form of order filed with the First Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: February 3, 2022

Respectfully submitted,

/s/ Benjamin L. Wallen

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2022, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Benjamin L. Wallen

Benjamin L. Wallen, Esq.